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Attorneys for Defendant Google LLC (erroneously sued as Google Inc.)

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

REPUBLICAN NATIONAL COMMITTEE,

Plaintiff,

v.

GOOGLE INC.,

Defendant.

Case No. 2:22-cv-01904-TLN-JDP

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE TO
RESPOND TO COMPLAINT**

1 Plaintiff Republican National Committee (“Plaintiff”) and Defendant Google LLC
2 (erroneously sued as “Google Inc.”) (“Defendant”) (collectively the “parties”), by and
3 through their undersigned counsel, hereby stipulate as follows:

4 1. WHEREAS, Plaintiff filed its Complaint on October 21, 2022, *see* Dkt. 1;

5 2. WHEREAS, Plaintiff served Defendant with its Complaint on November 17,
6 2022;

7 3. WHEREAS, Defendant’s response to the Complaint is due on or before
8 December 8, 2022;

9 4. WHEREAS, Defendant’s counsel was only recently retained on November 29,
10 2022;

11 5. WHEREAS, good cause exists to grant the extension, so that Defendant has time
12 to adequately respond to the allegations in the Complaint;

13 6. WHEREAS, on December 1, 2022, shortly after Defendant’s counsel was retained,
14 it reached out to Plaintiff’s counsel to discuss an extension of time to respond to the Complaint
15 and, accordingly, the parties are making this request as soon as reasonably practicable;

16 7. WHEREAS, Defendant will suffer significant prejudice if an extension is not
17 granted because it needs sufficient time to respond to the Complaint;

18 8. WHEREAS, due to Defendant’s counsel’s recent retention and the upcoming
19 holiday season, Defendant requests a 45-day extension of time to respond to the Complaint;

20 9. WHEREAS, Plaintiff does not oppose Defendant’s requested extension;

21 10. WHEREAS, the parties agree that neither party will suffer any prejudice if the
22 Court grants the extension of time to respond to the Complaint; and

23 11. WHEREAS, the parties have not previously requested extensions of any deadlines,
24 and the parties do not believe that this extension will affect the progress of the case.

25 THEREFORE, the parties hereby stipulate and agree as follows:

26 1. Defendant is granted a 45-day extension to respond to the Complaint;

27 2. Defendant’s response to the Complaint shall be due on January 23, 2023;

28 3. Plaintiff’s opposition brief, if any, shall be due on February 6, 2023; and

4. Defendant's reply brief, if any, shall be due on February 16, 2023.

IT IS SO STIPULATED.

Dated: December 1, 2022

PERKINS COIE LLP

By: /s/ Sunita Bali

Sunita Bali, Bar No. 274108

Attorneys for Google LLC (erroneously sued
as Google Inc.)

Dated: December 1, 2022

DHILLON LAW GROUP INC.

By: /s/ Thomas R. McCarthy

Harmeet K. Dhillon, SBN 207873

Michael A. Columbo (admission
forthcoming)

Jeremiah D. Graham

Anthony J. Fusaro, Jr. (admission
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Counsel for Plaintiff Republican National
Committee

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Thomas R. McCarthy (pro hac vice
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Thomas S. Vaseliou (pro hac vice
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Conor D. Woodfin (pro hac vice
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Counsel for Plaintiff Republican National
Committee

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ATTESTATION

Concurrence in the filing of this document has been obtained from the individual whose electronic signature is attributed above.

By: /s/ Sunita Bali

Sunita Bali, Bar No. 274108

Attorneys for Google LLC (erroneously sued
as Google Inc.)

[PROPOSED] ORDER

The Court, having reviewed the Stipulation to Extend Deadline to Respond Complaint, and good cause appearing, HEREBY ORDERS:

1. Defendant is granted a 45-day extension to respond to the Complaint;
2. Defendant's response to the Complaint shall be due on January 23, 2023;
3. Plaintiff's opposition brief, if any, shall be due on February 6, 2023; and
4. Defendant's reply brief, if any, shall be due on February 16, 2023.

IT IS SO ORDERED.

Dated: _____

By: _____

Troy L. Nunley
United States District Judge

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing has been served upon all counsel of record, via the Court's CM/ECF system on December 1, 2022, as follows:

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